

## REMARKS

Upon entry of this Amendment, claims 5-16 are pending. Claims 2-4 are cancelled without prejudice or disclaimer in response to a restriction requirement by the Examiner and election by Applicant without traverse. Claims 8, 15, and 16 are objected to for informalities. Amended claims 8, 15, and 16 have no informalities. Claims 5-16 variously stand rejected under 35 U.S.C. §103 as obvious in light of U.S. Patents 6,335,686 to *Goff*, 5,914,671 to *Tuttle*, 5,729,236 to *Flaxl*, 5,838,741 to *Callaway*, and 4,317,229 to *Craig*. The claims as amended traverse the Examiner's rejections. No new matter is submitted.

### Rejection Under §103

As explained in detail below, a *prima facie* case for rejection has not been made at least because: (a) When any one claimed limitation is wholly absent from the combination of references cited by the Examiner, a *prima facie* case for rejection for obviousness has not been made; and (b) Contrary to MPEP 2142, 2143.01 the Examiner does not state factual findings as a basis for motivation or suggestion to make the proposed combination. None of the art of record teaches or suggests the combination of limitations recited in each of the independent claims. Withdrawal of the rejections is respectfully requested.

The Examiner has taken the position that claims 5 through 16 are obvious in light of a proposed combination of the teachings of *Goff* with *Tuttle* cited to supply known network technology, *Flaxl* cited to supply known reactive elements and antenna multiplexing technology, *Callaway* cited to supply squelch technology, and *Craig* cited to supply difference circuit technology. Particularly, Applicant understands that the Examiner proposes a system as illustrated by the enclosed functional block diagram FIG. A. Support for details of the functional block diagram are stated with reference to col:line numbers of *Goff*. In the proposed system communication between a reader (*Goff*: 330) and a computer (*Goff*: 350) is implemented using a network as in *Tuttle*. The Examiner substitutes the network technology of *Tuttle* ("a network 154 connecting the interrogator 50 to the carrier reservation and baggage tracking system 152. Any appropriate network, such as a local area network, wide area network, Intranet network, Internet network, etc. can be employed." col. 16 line 10 et seq.) for the means of communication between the reader and computer in *Goff* ("The information obtained by reader 330 may be transferred by

suitable means, including wireless or wired connection, to a computer 350.” col. 15 lines 56 et seq.).

The system proposed by the Examiner differs from the system and antenna controller as claimed at least as follows.

Computer 350 is not a monitor as claimed at least because the following limitations recited in the claims are not met: (a) computer 350 does not “determine whether a provided radio frequency identification device is present”; and (b) a “radio frequency signal” is not “input” to computer 350. *Goff* teaches that reader 330 determines presence of a tag (“RFID readers and markers cooperate to insure that all items in the reader’s interrogation zone are successfully identified” col. 8 lines 1-2).

Incidentally, reader 330 is not a monitor as claimed at least because the following limitations recited in the claims are not met: (a) reader 330 does not provide via a network one or more commands that are identified to an antenna controller of a plurality of antenna controllers by an address of the command(s); and (b) reader 330 does not provide via a network one or more commands that are identified to an antenna controller of a plurality of antenna controllers by an address of the command(s) and further identify an antenna interface to be coupled to an amplifier.

The combination of reader 330 and control circuit 340 do not constitute an antenna controller as claimed at least because the following limitations recited in the claims are not met: (a) reader 330 in combination with control circuit 340 do not provide a “radio frequency signal to the monitor in accordance with the amplified signal”; (b) the combination does not include a coupler, radio frequency amplifier, and a plurality of interfaces each for coupling an antenna to the coupler. Limitation (a) is not met at least because computer 350 is not a monitor as discussed above.

Incidentally, the combination of control circuit 340, port 320, amplifier 325, and a multiplexer (hereafter “this combination”) integral to the tape is not an antenna controller as claimed at least because the following limitations recited in the claims are not met: (a) “a system comprising: a monitor ... and a plurality of antenna controllers”, to wit, *Goff* does not teach or suggest plural instances of this combination operating with one reader 330; (b) “a system comprising: a monitor ... and a plurality of antenna controllers coupled to the monitor via a provided network”, to wit, *Goff* does not teach or suggest a network coupling a reader to plural

instances of this combination; (c) this combination does not “receive from the monitor via the network one or more commands that are identified to an antenna controller of a plurality of antenna controllers by an address of the command(s)”; (d) this combination does not “receive via the network one or more commands that are identified to an antenna controller of a plurality of antenna controllers by an address of the command(s)” wherein the command(s) “identify an antenna interface” to be coupled to an amplifier; and (e) this combination does not include “a network interface”. These statements are true even if control circuit 340 is located “upstream” of port 320 as stated by *Goff*: “in one embodiment, the antenna tape of the present invention includes a control circuit that enables the reader to coordinate its interrogation with a specific, activated portion of the antenna tape.” (col. 13 lines 39 et seq.); and “It should be noted that portions of the system indicated as being detachable from the antenna tape, including reader 330 and control circuit 340 may be either upstream or downstream of a port, as desired.” (col. 15 lines 43 et seq.).

Addressable antenna elements as taught by *Goff* do not teach or suggest both functions recited as “commands ... identified to the antenna controller by an address of the one or more commands” (e.g., an antenna controller address) and “at least one antenna interface identified by the one or more commands” (e.g., an antenna interface address). No art of record meets or suggests the combination of this limitation.

Care should be taken to distinguish and identify the entity intended to execute a command as taught in prior art references. In particular a command transmitted for execution by a radio frequency identification device is not a command as claimed, at least because commands as claimed are not intended to be executed by a radio frequency identification device, but rather, an antenna controller.

Port 320 is not an antenna interface as claimed at least because the following limitation recited in the claims is not met: “an antenna controller of the plurality [of antenna controllers comprises]” ... “a plurality of antenna interfaces, each for coupling a provided antenna to ...[a] coupler” that “in response to one or more commands .. couples at least one antenna interface identified by the one or more commands to ... [an] amplifier”. *Goff* does not teach or suggest a plurality of ports corresponding to a plurality of antenna interfaces of one antenna controller. Further, *Goff* does not teach or suggest the cooperation of port 320 and a coupler in a way that teaches or suggests that port 320 accomplishes the functions of an antenna interface. The claim

language implies that to perform a recited function of an antenna controller, the antenna interface passes a signal from the provided antenna through itself en route to the coupler then through the coupler to the amplifier. The configurations in FIG. 10 and FIG. A cannot accomplish this signal flow if port 320 is characterized as an antenna interface. The claimed cooperation of antenna interface and coupler cannot be accomplished in the configuration of FIG. 10 at least because *Goff* does not teach or suggest the claimed functions of a coupler between port 320 and amplifier 325. The claimed cooperation of antenna interface and coupler cannot be accomplished in the configuration of FIG. A at least because the port is not between the antenna and the amplifier.

Incidentally, a port as taught by *Goff* (see FIG. A and FIG. 10 of *Goff*) is not a network interface as claimed at least because the following combination of limitations recited in the claims is not met: “the network for conveying one or more commands” and such commands are “identified to the antenna controller by an address” and “at least one antenna interface [is] identified by the one or more commands”. A port as taught by *Goff* seems to be merely a point of detachment of the tape from the remainder of the system. (col. 15 lines 41 et seq.). If reader 330 and control circuit 340 are upstream of port 320, as discussed above, then port 320 would indeed cooperate with an implied network either wired or wireless as taught by *Goff* as “the information obtained by reader 330 may be transferred [to computer 350] by ... wired or wireless connection.” (col. 15 lines 56 et seq.). Such an implied network is not the claimed network at least because the implied network does not couple a monitor (computer 350 is not a monitor) to a plurality of antenna controllers (reader 330 is not an antenna controller). Consequently, even this implementation of port 320 is not a network interface as claimed.

As discussed above, several of the limitations recited in each of the pending independent claims are not properly found in *Goff* and are not supplied by the other art of record.

In addition, the invention claimed by applicant produces different results than provided by systems of the prior art. For example, use of antenna controllers responsive to commands and a network that conveys radio frequency signals among antenna controllers and a monitor omits the expense of an interrogator for each group of antennas as taught by *Tuttle*. Use of a network among antenna controllers facilitates performing tuning, obtaining an algebraic difference of radio frequency signals, and controlling squelch functions all of which promote efficient and accurate monitoring of RFID devices at lower cost than possible with conventional systems.

The Examiner has not in every claim rejection stated facts that would support suggestion to combine sufficient to produce a proposed combination that would make the invention of each independent claims obvious. Applicant respectfully asks that the Examiner clearly so state if the pending claims are subject to obviousness rejection in the future.

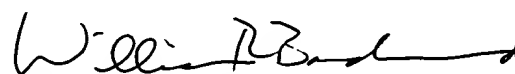
Conclusion

Reconsideration is respectfully requested. Applicant believes the case is in condition for allowance and respectfully requests withdrawal of the rejections and allowance of the pending claims.

The Examiner is invited to telephone the undersigned at the telephone number listed below if it would in any way advance prosecution of this case.

Respectfully submitted,

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